

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

JOHN PLAINTIFF,  
Plaintiff,

vs. Case No. 2:20-cv-11718-GAD-DRG

WAYNE STATE UNIVERSITY,  
WAYNE STATE UNIVERSITY  
SCHOOL OF MEDICINE,  
NICOLINA CAMAJ, MARGIT CHADWELL,  
MATTHEW JACKSON, RICHARD S. BAKER,  
R. DARIN ELLIS, in their individual  
and official capacities,  
jointly and severally,  
Defendants.

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VIDEOCONFERENCE DEPOSITION

DEPONENT: MATTHEW JACKSON, Ph.D.  
TIME: 9:59 a.m.  
DATE: Friday, November 19, 2021  
REPORTER: Denise M. Kizy, RPR, CRR, CSR-2466

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<p style="text-align: right;">Page 54</p> <p>1 referring to a specific policy of the</p> <p>2 Professionalism Committee?</p> <p>3 MR. FLORES: I am. I am.</p> <p>4 MR. PORTER: I think it would be</p> <p>5 helpful if we show the witness the document so</p> <p>6 that he can --</p> <p>7 MR. FLORES: Okay. Please publish</p> <p>8 Exhibit A.</p> <p>9 MR. PORTER: Feel free to take your</p> <p>10 time to read the document.</p> <p>11 MR. FLORES: And if you would take a</p> <p>12 look at page 9 of 12. If you would go down to</p> <p>13 page 9 of 12, and if you would just show that to</p> <p>14 Dr. Jackson, let him familiarize himself with</p> <p>15 it.</p> <p>16 <b>THE WITNESS: Okay.</b></p> <p>17 BY MR. FLORES:</p> <p>18 Q. And if you would just go up to page 8</p> <p>19 of 12 as well, take a look at that.</p> <p>20 <b>A. Okay.</b></p> <p>21 Q. All right. So is it accurate to say</p> <p>22 that the Dean of Students, the Dean of Basic</p> <p>23 Sciences or the Assistant Dean of Clinical</p> <p>24 Sciences, that those individuals can receive</p> <p>25 complaints and undertake an investigation?</p>	<p style="text-align: right;">Page 56</p> <p>1 <b>forwarded to me.</b></p> <p>2 MR. FLORES: Could you slowly scroll</p> <p>3 for Dr. Jackson.</p> <p>4 Dr. Jackson, if you need them to stop</p> <p>5 at any point, just ask them to.</p> <p>6 Just scroll through just to make sure</p> <p>7 that we're talking about the same document.</p> <p>8 MR. PORTER: Bob, I'm not seeing any</p> <p>9 Bates numbers on this document. Was this in</p> <p>10 your client's possession or was it produced?</p> <p>11 MR. FLORES: I believe this was</p> <p>12 produced. I'm not sure why there are no Bates</p> <p>13 stamps on here.</p> <p>14 MR. PORTER: Okay. But it's in your</p> <p>15 client's possession?</p> <p>16 MR. FLORES: Yeah, and it was listed</p> <p>17 as the Professionalism Committee file.</p> <p>18 MR. PORTER: Produced by you to us?</p> <p>19 MR. FLORES: No, produced by you to</p> <p>20 us, because we would have had Bates stamps on</p> <p>21 it, too. I'm not sure why they're not on here.</p> <p>22 MR. PORTER: Okay.</p> <p>23 BY MR. FLORES:</p> <p>24 Q. Does that look like the document that</p> <p>25 you -- the document and materials that you</p>
<p style="text-align: right;">Page 55</p> <p>1 MR. PORTER: Objection; form.</p> <p>2 <b>THE WITNESS: Yes, that's correct.</b></p> <p>3 BY MR. FLORES:</p> <p>4 Q. And one of the outcomes there is that</p> <p>5 no further action is taken; is that right?</p> <p>6 <b>A. Yes, that's possible, yes.</b></p> <p>7 Q. Now in this case at some point in</p> <p>8 time did you receive a report from the Office of</p> <p>9 the Dean of Students at the medical school</p> <p>10 regarding my client, Anthony Eid?</p> <p>11 <b>A. The report came to Dr. Chadwell, and</b></p> <p>12 <b>then Dr. Chadwell provided the material to me.</b></p> <p>13 MR. FLORES: All right. And would</p> <p>14 you please publish Exhibit B for Dr. Jackson.</p> <p>15 I'm sorry, that's not Exhibit B.</p> <p>16 Exhibit C.</p> <p>17 MARKED FOR IDENTIFICATION:</p> <p>18 EXHIBIT C</p> <p>19 11:23 a.m.</p> <p>20 MR. FLORES: And if you would scroll</p> <p>21 down to the next page.</p> <p>22 BY MR. FLORES:</p> <p>23 Q. Dr. Jackson, do you recognize that?</p> <p>24 <b>A. Yes, that as my recollection is that</b></p> <p>25 <b>was with the material that Dr. Chadwell</b></p>	<p style="text-align: right;">Page 57</p> <p>1 received from Dr. Camaj?</p> <p>2 <b>A. Yes, it looks like what she provided</b></p> <p>3 <b>to Margit Chadwell and then Margit Chadwell</b></p> <p>4 <b>provided it to me.</b></p> <p>5 Q. Okay. Yes. I apologize for that.</p> <p>6 That's my mistake.</p> <p>7 Now when you receive a document like</p> <p>8 this as the chair of the Professionalism</p> <p>9 Committee, what's your first responsibility with</p> <p>10 respect to the information you receive?</p> <p>11 <b>A. Well, first, it would be to schedule</b></p> <p>12 <b>a Professionalism Committee meeting with all the</b></p> <p>13 <b>different members. That would be the first</b></p> <p>14 <b>responsibility.</b></p> <p>15 Q. And do you have any responsibility</p> <p>16 with respect to investigation?</p> <p>17 MR. PORTER: Objection; form.</p> <p>18 <b>THE WITNESS: Yes, if there would be</b></p> <p>19 <b>additional documentation that was needed then I</b></p> <p>20 <b>would have the responsibility of contacting</b></p> <p>21 <b>individuals who may be able to provide that.</b></p> <p>22 BY MR. FLORES:</p> <p>23 Q. And do you remember if you read</p> <p>24 through the material that you received from Dr.</p> <p>25 Chadwell shortly after receiving it?</p>

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<p style="text-align: right;">Page 62</p> <p>1 Q. Did you investigate the complainant</p> <p>2 to determine whether her claims to have felt</p> <p>3 harassed were supported by the evidence?</p> <p>4 MR. PORTER: Objection; form.</p> <p>5 <b>THE WITNESS: No, I did not.</b></p> <p>6 BY MR. FLORES:</p> <p>7 Q. Did there come a time that you</p> <p>8 conducted an investigation with respect to where</p> <p>9 my client lived?</p> <p>10 MR. PORTER: Objection; form.</p> <p>11 <b>THE WITNESS: During the</b></p> <p>12 <b>Professionalism Committee, we have record of</b></p> <p>13 <b>where students' addresses, so during the</b></p> <p>14 <b>Professionalism Committee hearing we looked that</b></p> <p>15 <b>up on-line and found --</b></p> <p>16 BY MR. FLORES:</p> <p>17 Q. I'm sorry?</p> <p>18 <b>A. And we found his address at that</b></p> <p>19 <b>time.</b></p> <p>20 Q. And was there a charge that related</p> <p>21 to my client's address that you recall?</p> <p>22 MR. PORTER: Objection; form.</p> <p>23 <b>THE WITNESS: The implication was</b></p> <p>24 <b>that Amanda had mapped the location of the</b></p> <p>25 <b>individual who had taken over her account,</b></p>	<p style="text-align: right;">Page 64</p> <p>1 the subject of unauthorized access?</p> <p>2 MR. PORTER: Objection; form.</p> <p>3 <b>THE WITNESS: No, I didn't</b></p> <p>4 <b>investigate that.</b></p> <p>5 BY MR. FLORES:</p> <p>6 Q. And did you ever learn whether</p> <p>7 Nikolina Camaj ever conducted an actual</p> <p>8 investigation regarding the complaint or --</p> <p>9 MR. PORTER: Objection; form. Sorry.</p> <p>10 BY MR. FLORES:</p> <p>11 Q. Based on your recollection, what was</p> <p>12 Ms. Camaj's responsibility or role in this case?</p> <p>13 <b>A. My understanding was that she</b></p> <p>14 <b>collected the initial documents and then that</b></p> <p>15 <b>she interviewed Amanda Burton and Anthony Eid</b></p> <p>16 <b>and collected -- I believe that he provided a</b></p> <p>17 <b>statement as part of that interview, and that</b></p> <p>18 <b>was part of the packet that she forwarded over</b></p> <p>19 <b>to Dr. Chadwell.</b></p> <p>20 Q. Do you remember whether she actually</p> <p>21 investigated whether the claims made by either</p> <p>22 party were accurate?</p> <p>23 MR. PORTER: Objection; form.</p> <p>24 <b>THE WITNESS: I'm not aware that she</b></p> <p>25 <b>did that, no.</b></p>
<p style="text-align: right;">Page 63</p> <p>1 <b>someone had spoofed her account and was</b></p> <p>2 <b>pretending to be her on-line, and she was able</b></p> <p>3 <b>to map that individual to a location in Detroit,</b></p> <p>4 <b>and that location corresponded to Mr. Eid's</b></p> <p>5 <b>address at that time.</b></p> <p>6 BY MR. FLORES:</p> <p>7 Q. Is it your testimony today that the</p> <p>8 location that had been mapped was my client's</p> <p>9 specific address?</p> <p>10 <b>A. As I recall from that, it was -- the</b></p> <p>11 <b>location was mapped to an intersection and his</b></p> <p>12 <b>address was adjacent. It was on the corner of</b></p> <p>13 <b>that intersection is what I recall.</b></p> <p>14 Q. But you did not -- or let me -- I'll</p> <p>15 withdraw that.</p> <p>16 Did you interview any of the</p> <p>17 complainants' friends who allegedly had</p> <p>18 knowledge about the harassment?</p> <p>19 <b>A. No, I did not.</b></p> <p>20 Q. Did you ask the Wayne State Police</p> <p>21 Department to run a criminal background check on</p> <p>22 the complainant?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Did you investigate whether my</p> <p>25 client's banking or social media accounts were</p>	<p style="text-align: right;">Page 65</p> <p>1 BY MR. FLORES:</p> <p>2 Q. Was there ever a time that you asked</p> <p>3 my client to surrender his computer and cell</p> <p>4 phone for the purpose of submitting it for a</p> <p>5 forensics analysis?</p> <p>6 <b>A. No.</b></p> <p>7 Q. Are you aware of whether Nikolina</p> <p>8 Camaj ever had a forensic examination of the</p> <p>9 computer or phone done?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Did you ever learn that the events</p> <p>12 complained of by her did not take place on Wayne</p> <p>13 State University property?</p> <p>14 <b>A. My understanding -- I'm not clear on</b></p> <p>15 <b>your question.</b></p> <p>16 Q. Are you aware now -- let me rephrase</p> <p>17 that.</p> <p>18 How did you determine -- let me</p> <p>19 withdraw that.</p> <p>20 Under the school's rules, the</p> <p>21 university has a responsibility to investigate</p> <p>22 conduct that occurs on school property; is that</p> <p>23 correct?</p> <p>24 MR. PORTER: Objection; lack of</p> <p>25 foundation. Are we still talking about the</p>

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<p style="text-align: right;">Page 78</p> <p>1 met in a conference room. There was an area</p> <p>2 outside where they could wait, but I told him to</p> <p>3 come and wait after they were finished.</p> <p>4 So I -- the answer is I don't know</p> <p>5 where he was waiting when they were in the room.</p> <p>6 He was not in the vicinity of the conference</p> <p>7 room that we were meeting with them.</p> <p>8 Q. And was that intentional on your</p> <p>9 part?</p> <p>10 A. Yes.</p> <p>11 Q. What was the reason for that?</p> <p>12 A. I didn't want them to have to</p> <p>13 interact in person.</p> <p>14 Q. Were you aware that one of the goals</p> <p>15 of Mrs. Burton's was to make sure that Anthony</p> <p>16 did not become a doctor?</p> <p>17 MR. PORTER: Objection; form and</p> <p>18 foundation.</p> <p>19 THE WITNESS: I was not aware of</p> <p>20 that.</p> <p>21 BY MR. FLORES:</p> <p>22 Q. If you had known that would you</p> <p>23 have -- would that have affected your evaluation</p> <p>24 of her testimony?</p> <p>25 MR. PORTER: Objection; form.</p>	<p style="text-align: right;">Page 80</p> <p>1 A. Yes, they did. They would have</p> <p>2 asked -- they asked him a number of questions.</p> <p>3 Q. Do you remember any of the questions</p> <p>4 that he was asked?</p> <p>5 A. I don't recall specific questions,</p> <p>6 no.</p> <p>7 Q. Prior to his testimony that morning,</p> <p>8 did you provide him with a summary of what</p> <p>9 had -- what Amanda Burton or Pamela Burton had</p> <p>10 testified to?</p> <p>11 MR. PORTER: Objection; form.</p> <p>12 THE WITNESS: No, I did not.</p> <p>13 BY MR. FLORES:</p> <p>14 Q. So that all that he would have known</p> <p>15 about the complaint against him was related to</p> <p>16 the materials you had shown him during your</p> <p>17 meeting?</p> <p>18 MR. PORTER: Objection; form.</p> <p>19 THE WITNESS: That was the</p> <p>20 information that he had going to the committee,</p> <p>21 correct. He had reviewed the documents that</p> <p>22 they had.</p> <p>23 BY MR. FLORES:</p> <p>24 Q. Now, Dr. Jackson, if I accused you of</p> <p>25 a crime to a police officer, do you think it's</p>
<p style="text-align: right;">Page 79</p> <p>1 THE WITNESS: Well, I didn't evaluate</p> <p>2 her testimony. That was up to the committee. I</p> <p>3 didn't have any role in the decision-making. I</p> <p>4 was just -- I chaired it, so it was a logistics</p> <p>5 process. So, no, it wouldn't have affected my</p> <p>6 actions, no.</p> <p>7 BY MR. FLORES:</p> <p>8 Q. Do you think it might have affected</p> <p>9 any of the Professionalism Committee members?</p> <p>10 MR. PORTER: Objection; calls for</p> <p>11 speculation.</p> <p>12 THE WITNESS: I would have to</p> <p>13 speculate to try and speculate what was in their</p> <p>14 mind at the time. I don't know.</p> <p>15 BY MR. FLORES:</p> <p>16 Q. Now when my client entered the room</p> <p>17 that the hearing was being held in, was he</p> <p>18 introduced by anybody?</p> <p>19 A. Me. I would have introduced him to</p> <p>20 the committee.</p> <p>21 Q. And did you ask him any questions?</p> <p>22 A. I don't recall specifically. I</p> <p>23 believe I may asked him to confirm his address.</p> <p>24 Q. And did any of the members of the</p> <p>25 Professionalism Committee ask him any questions?</p>	<p style="text-align: right;">Page 81</p> <p>1 important for the police officer to ascertain</p> <p>2 what relationship you and I have?</p> <p>3 MR. PORTER: Objection; calls for</p> <p>4 speculation and form.</p> <p>5 BY MR. FLORES:</p> <p>6 Q. If you can answer it.</p> <p>7 A. I wouldn't think that the police</p> <p>8 officer would be responsible for finding out the</p> <p>9 nature of our relationship. I think they</p> <p>10 would -- you know, I would think they would just</p> <p>11 have to respond to the complaint and deal with</p> <p>12 it from there. I don't think it would be there</p> <p>13 position to understand if there was some</p> <p>14 history, for example, in your scenario between</p> <p>15 us.</p> <p>16 Q. But in this case your job was to</p> <p>17 investigate the charges against my client; is</p> <p>18 that right?</p> <p>19 MR. PORTER: Objection; form.</p> <p>20 THE WITNESS: Investigation to the</p> <p>21 point of gathering the information, the</p> <p>22 documents, that were going to be provided to the</p> <p>23 Professionalism Committee, but no, not</p> <p>24 investigate beyond that point. Not to the</p> <p>25 point, for example, a criminal investigation or</p>

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<p style="text-align: right;">Page 90</p> <p>1 after notifying was then I provided all the 2 documents to the chair of Promotions Committee 3 who then would have been responsible for 4 coordinating and organizing that committee 5 meeting and then communicating to Mr. Eid for 6 that meeting date. 7 BY MR. FLORES: 8 Q. And did you have any further 9 involvement with the case after writing the 10 letter to my client informing him of the 11 decision? 12 MR. PORTER: Objection; form. 13 <b>THE WITNESS: I forwarded all the</b> 14 <b>documentation to the Promotions Committee, and</b> 15 <b>that was my involvement. I attended the</b> 16 <b>Promotions Committee meeting, but I wasn't on</b> 17 <b>that committee.</b> 18 BY MR. FLORES: 19 Q. Did you speak at the Promotions 20 Committee meeting? 21 <b>A. I don't recall if I -- my role in</b> 22 <b>that committee would have been to answer</b> 23 <b>questions from the actual committee, but I do</b> 24 <b>not recall if they had any questions of me.</b> 25 Q. Do you remember whether Dr. Chadwell</p>	<p style="text-align: right;">Page 92</p> <p>1 out and look at accounts and looks into other, 2 you know, other issues, and no, they could not 3 be in the role of investigating that. I think 4 the goal was they were presented with the 5 material, reviewed it, and then they had the 6 opportunity to ask the student in this case what 7 happened, his own words. 8 <b>So I would say, no, the goal was for</b> 9 <b>them to gain a better understanding of what was</b> 10 <b>going on, of his motivations and the outcomes.</b> 11 BY MR. FLORES: 12 Q. But my client testified that he had a 13 legitimate purpose for staying in contact with 14 Amanda Burton; is that right? 15 MR. PORTER: Objection; assumes facts 16 not in evidence. 17 <b>THE WITNESS: I seem to recall that</b> 18 <b>that was his testimony with the Professionalism</b> 19 <b>Committee was yes, he argued he had a legitimate</b> 20 <b>reason staying in contact with her.</b> 21 BY MR. FLORES: 22 Q. And he denied sending any lawyer 23 letter, fraudulent or otherwise, to Amanda 24 Burton; is that right? 25 <b>A. I seem to recall he did deny that,</b></p>
<p style="text-align: right;">Page 91</p> <p>1 was at that Promotions Committee meeting? 2 <b>A. I don't recall specifically. I would</b> 3 <b>be presuming or assuming because she was in</b> 4 <b>attendance at all of those, but I would assume</b> 5 <b>yes. I can't say for certain that she was</b> 6 <b>there. I don't recall.</b> 7 Q. Dr. Jackson, looking back at the way 8 you conducted the Professionalism Committee 9 hearing for my client, what was the most 10 important goal that you had for that hearing? 11 MR. PORTER: Objection; form, 12 foundation. 13 <b>THE WITNESS: The goal would be to</b> 14 <b>provide the student, in this case Anthony Eid,</b> 15 <b>an opportunity to tell his side of things to the</b> 16 <b>committee.</b> 17 BY MR. FLORES: 18 Q. It was not to fully investigate the 19 charges against him? 20 MR. PORTER: Objection; 21 argumentative. 22 <b>THE WITNESS: My interpretation of</b> 23 <b>the word "investigate" was that committee would</b> 24 <b>have been responsible for digging deeper. Some</b> 25 <b>of the questions you've asked me, did they go</b></p>	<p style="text-align: right;">Page 93</p> <p>1 <b>yes.</b> 2 Q. So clearly there was a dispute 3 between the different -- in terms of the witness 4 testimony, what Ms. Burton testified to and what 5 Mr. Eid testified to were in conflict with one 6 another; is that right? 7 MR. PORTER: Objection to the extent 8 that you are characterizing his prior testimony, 9 that's not accurate, but if you can answer the 10 question, feel free. 11 <b>THE WITNESS: I don't think there was</b> 12 <b>a discussion of the conflict between them. It</b> 13 <b>was not a he said, she said. There was so</b> 14 <b>much -- there was so much documentation with all</b> 15 <b>the text messages that did come from Anthony Eid</b> 16 <b>that I think my opinion was the committee saw</b> 17 <b>that as something that was very impactful, very</b> 18 <b>important, to their decision-making.</b> 19 BY MR. FLORES: 20 Q. But at the same time the allegation 21 was that all of that conduct back and -- all 22 that communication back and forth was 23 legitimate, it had a legitimate purpose. 24 Didn't that make a difference to the 25 committee?</p>



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<p style="text-align: right;">Page 110</p> <p>1 university -- well, as far as I know legally in 2 Michigan, it's prohibited. 3 BY MR. FLORES: 4 Q. It's prohibited from recording a 5 Professionalism Committee hearing? 6 A. Well, I was putting that in a 7 different context. No, if everybody in 8 attendance is aware that it's being recorded 9 then it's permitted, yes. I was thinking of 10 somebody -- 11 MR. PORTER: Objection. Are we 12 talking about generally or this Professionalism 13 Committee that Mr. Eid attended? 14 BY MR. FLORES: 15 Q. The Professionalism Committee that 16 you chaired, was there any rule that you were 17 aware of that prohibited you from recording the 18 hearing? 19 A. No, I'm not aware of any rule that 20 would prohibit that. 21 Q. Dr. Jackson, are you familiar with a 22 Dear Colleague letter that was sent by the 23 Department of Education's Office of Civil Rights 24 to schools, colleges and universities in 2011 25 dealing with Title 9?</p>	<p style="text-align: right;">Page 112</p> <p>1 Ms. Robichaud probably at the same time, but, 2 yes, I would have had conversations with them. 3 Q. And do you remember what the nature 4 of that conversation was? 5 A. No, no, other than -- it would be 6 speculation. I'm trying to recall what 7 happened, but it would just be the nature of the 8 next step would be the Promotions Committee. 9 Q. Do you recall whether or not Dr. 10 Chadwell or Ms. Robichaud was pleased with the 11 decision by the Professionalism Committee? 12 MR. PORTER: Objection; calls for 13 speculation. 14 THE WITNESS: I can't -- 15 BY MR. FLORES: 16 Q. Did either of them express an opinion 17 as to whether or not the Professionalism 18 Committee had reached the proper decision? 19 A. Yeah, I don't recall them expressing 20 any opinion after the decision was made. 21 Q. Do you know how many conversations 22 you had with them, do you remember? 23 A. No, I don't. 24 MR. FLORES: If you would publish 25 Exhibit B for Dr. Jackson.</p>
<p style="text-align: right;">Page 111</p> <p>1 A. No, I can't say that I'm familiar 2 with that. 3 Q. Are you aware of what penalties the 4 Department of Education can impose on a school 5 that fails to properly address Title 9 concerns? 6 A. No. I'm not aware of those 7 penalties. 8 Q. And after the close of the 9 Professionalism hearing on February 7th of 2019, 10 did you have any conversations with my client? 11 A. No, other than the e-mail 12 communication I had to him with the letter 13 giving the decision of the Professionalism 14 Committee, but no conversations. 15 Q. Did you talk to Dean Chadwell after 16 the Professionalism Committee reached its 17 decision? 18 A. Specifically about the decision or 19 Mr. Eid? 20 Q. Any aspect of the case. 21 A. I don't recall any specific 22 conversations, but very possibly I did. 23 Q. How about with Ms. Robichaud? 24 A. If it would have been -- if it would 25 have been Dr. Chadwell it would have been</p>	<p style="text-align: right;">Page 113</p> <p>1 MARKED FOR IDENTIFICATION: 2 EXHIBIT B 3 1:17 p.m. 4 BY MR. FLORES: 5 Q. Dr. Jackson, if you would, just read 6 that first portion and once you're done let me 7 know. 8 A. All right. 9 Q. And are you familiar with this 10 document prior to my showing it to you this 11 morning? 12 A. No, I'm not. 13 MR. FLORES: All right. I have no 14 further questions for the witness. 15 Dr. Jackson, thank you very much for 16 your time today. I appreciate it. 17 MR. PORTER: I'm going to ask him a 18 few questions. 19 MR. FLORES: Sure. 20 EXAMINATION 21 BY MR. PORTER: 22 Q. Dr. Jackson, did you meet with 23 Anthony Eid on January 25, 2019? 24 A. Yes, I believe that was the prep 25 session.</p>

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<p style="text-align: right;">Page 114</p> <p>1 Q. And was the purpose of that to 2 provide him the materials that would be later 3 provided to the Professionalism Committee? 4 <b>A. Yes.</b> 5 Q. Did he have an opportunity during 6 that meeting to review the materials? 7 <b>A. Yes.</b> 8 Q. Did he ask you any questions about 9 any of the materials? 10 <b>A. I don't recall him asking specific</b> 11 <b>questions about the material, no.</b> 12 Q. Were you present while he was 13 reviewing the materials? 14 <b>A. Yes, I was.</b> 15 Q. And did he deny the -- well, strike 16 that. 17 Included in those materials were text 18 messages that were provided by Amanda Burton 19 between her and Anthony Eid; is that correct? 20 <b>A. Yes, that's correct.</b> 21 Q. And those were included in the packet 22 of materials; is that correct? 23 <b>A. Yes.</b> 24 Q. And did he deny sending any of the 25 text messages as he was reviewing them there in</p>	<p style="text-align: right;">Page 116</p> <p>1 really -- I couldn't understand the question. 2 Can you repeat it? 3 BY MR. PORTER: 4 Q. Is it your testimony earlier today 5 that the primary focus of the Professionalism 6 Committee is on the student in question and 7 their conduct during the Professionalism 8 Committee? 9 <b>A. Yes, that's correct.</b> 10 Q. And was that true in Mr. Eid's case? 11 <b>A. Yes.</b> 12 Q. And so would it be fair to say that 13 any testimony by Ms. Burton that may have been, 14 in Mr. Flores' words, inconsistent was not 15 material to the purpose or the objective of the 16 Professionalism Committee? 17 <b>A. That's correct.</b> 18 Q. Earlier today you were asked 19 questions about, quote, charges that were filed 20 against Mr. Eid in front of the Professionalism 21 Committee; is that correct? 22 <b>A. Yes.</b> 23 Q. And is it your understanding that 24 there are multiple charges filed against the 25 particular student or just a charge?</p>
<p style="text-align: right;">Page 115</p> <p>1 your office? 2 <b>A. No, he did not.</b> 3 Q. That material was then later provided 4 to the Professionalism Committee; is that 5 correct? 6 <b>A. Yes, that's correct.</b> 7 Q. And was he asked questions about 8 those text messages during the Professionalism 9 Committee? 10 <b>A. Yes.</b> 11 Q. Did he deny sending any of the text 12 messages during the Professionalism Committee? 13 <b>A. No, he did not.</b> 14 Q. Did he take responsibility for 15 sending them? 16 <b>A. Yes, he did.</b> 17 Q. Mr. Flores asked you some questions 18 about disputes between Ms. Burton and Mr. Eid, 19 and as I heard you testify the primary emphasis 20 of inquiry by the Professionalism Committee was 21 on the statements that the student was subject 22 to the Professionalism Committee gave to the 23 Professionalism Committee; is that true? 24 <b>A. Yes, that's the principal mission.</b> 25 MR. FLORES: I'm sorry, David, I</p>	<p style="text-align: right;">Page 117</p> <p>1 <b>A. In this particular case, there were</b> 2 <b>multiple charges.</b> 3 Q. Okay. And what was just the -- what 4 was the overall description or nature of the 5 charge against Mr. Eid? 6 <b>A. I think it was the cyberstalking and</b> 7 <b>continued aggressive messages, unwanted</b> 8 <b>messages, that he sent to Amanda.</b> 9 Q. Okay. And then earlier today you 10 were asked questions about the Student Code of 11 Conduct. Do you recall? 12 <b>A. Yes.</b> 13 Q. Does the Professionalism Committee 14 follow the guidelines that are set out in the 15 Student Code of Conduct? 16 <b>A. No, it doesn't.</b> 17 Q. Is the Professionalism Committee 18 bound by those guidelines? 19 <b>A. No, it's not.</b> 20 Q. Okay. That's all the questions I 21 have for you. 22 MR. PORTER: Bob, anything more? 23 MR. FLORES: No. 24 MR. PORTER: Denise, I assume Mr. 25 Flores ordered a copy of the transcript or</p>